

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ROSIE MARTINEZ,

Plaintiff,

v.

CITY OF NEW YORK, Detective ERIC RYAN,  
Lieutenant DAVID CAMHI, Sergeant JOSEPH  
DIGENNARO, and Sergeant KEITH LALIBERTE,

Defendants.  
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**SPECIAL  
INTERROGATORY**

16-CV-79 (NRM) (CLP)

*The following questions all concern the time period between when plaintiff Rosie Martinez was first brought to the 107<sup>th</sup> precinct on the evening of January 22, 2015, until she was first taken to Central Booking on the morning of January 23, 2015.*

1. Did the plaintiff complain of, or otherwise indicate that she was experiencing, extreme pain while at the 107<sup>th</sup> precinct?

YES X NO \_\_\_\_\_

*If your answer to Question 1 is "No," please skip Questions 2 through 5 and proceed to Question 6.*

*If your answer to Question 1 is "Yes," please answer Questions 2 through 5.*

2. Was defendant Eric Ryan aware that the plaintiff had complained of, or was otherwise experiencing, extreme pain?

YES X NO \_\_\_\_\_

3. Was defendant Joseph DiGennaro aware that the plaintiff had complained of, or was otherwise experiencing, extreme pain?

YES X NO \_\_\_\_\_

4. Was defendant David Camhi aware that the plaintiff had complained of, or was otherwise experiencing, extreme pain?

YES X NO \_\_\_\_\_

5. Was defendant Keith Laliberte aware that the plaintiff had complained of, or was otherwise experiencing, extreme pain?

YES X NO \_\_\_\_\_

6. Did defendant Eric Ryan reasonably believe – even if he was mistaken – that the plaintiff was not experiencing extreme pain while at the 107<sup>th</sup> precinct?

YES \_\_\_\_\_ NO X

7. Did defendant Joseph DiGennaro reasonably believe – even if he was mistaken – that the plaintiff was not experiencing extreme pain while at the 107<sup>th</sup> precinct?

YES \_\_\_\_\_ NO X

8. Did defendant David Camhi reasonably believe – even if he was mistaken – that the plaintiff was not experiencing extreme pain while at the 107<sup>th</sup> precinct?

YES \_\_\_\_\_ NO X

9. Did defendant Keith Laliberte reasonably believe – even if he was mistaken – that the plaintiff was not experiencing extreme pain while at the 107<sup>th</sup> precinct?

YES \_\_\_\_\_ NO X

**You have finished deliberations on the special interrogatory. Please have your foreperson sign this form and inform the Court, by written note, that you have completed the special interrogatory.**

M. Queen #1 Foreperson

Date: December 13, 2022